

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
WILKES-BARRE DIVISION**

<b>In re:</b>	)	
<b>Juana Ortiz,</b>	)	<b>Case No.: 5:22-bk-00155-MJC</b>
<b>Debtor.</b>	)	<b>Chapter 13</b>
<hr/>		
<b>Kingdom RCG Evergreen Fund Series I LLC,</b>	)	<b>Trustee Jack N. Zaharopoulos</b>
<b>Movant,</b>	)	<b>Jude Mark J. Conway</b>
<b>v.</b>	)	
<b>Juana Ortiz,</b>	)	
<b>Respondent.</b>	)	

\* \* \* \* \*

**NOTICE OF DEFAULT STIPULATION [DOC. NO. 75]**

1. On or about January 28, 2022, the above referenced Debtor filed a Voluntary Petition for Relief pursuant to Chapter 13 of the United States Bankruptcy Code.
2. On or about September 23, 2024, Movant filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d) for its claim to the real property commonly known as 620 N. Putnam St., West Hazleton, PA 18202 (the “Property”). [Doc. No. 61].
3. On or about February 5, 2025, Debtor and Movant entered into a Stipulation (the “Stipulation”), allowing the automatic stay to remain in effect for the Property, which was approved by court order on or about February 6, 2025. [Doc. No. 76].
4. Debtor has defaulted under the terms of paragraph 7 of the Stipulation by failing to file an Amended Plan to include the post-petition arrears of \$16,224.92.
5. Debtor has defaulted under the terms of paragraph 8 of the Stipulation by failing to make the payments called for to Movant. Specifically, Debtor is due for the December 1, 2024 payment, and all subsequent payments thereafter.
6. Pursuant to paragraph 10 of the Stipulation, the Debtor has fifteen (15) days to cure the default after receipt of this Notice of Default before Movant may obtain an Order Vacating the Automatic Stay, by submitting the same to this Court along with a Certification of Default.

Date: April 9, 2025

DWALDMANLAW, P.C.  
4900 Carlisle Pike, #182  
Mechanicsburg, PA 17050  
Telephone: (844) 899-4162  
Facsimile: (844) 882-4703  
Email 1: jennie@dwaldmanlaw.com  
Email 2: tiffany@dwaldmanlaw.com  
Attorneys for Secured Creditor

By: /s/ Jennie C. Shnayder  
Jennie C. Shnayder, Esq.  
PA Bar ID# 315213

**SERVICE LIST:**

*Debtor*  
Juana Ortiz  
620 N. Putnam St.  
West Hazleton, PA 18202

Tullio DeLuca  
381 N. 9th Avenue  
Scranton, PA 18504  
*Debtor(s) Attorney*

*Trustee*  
Jack N Zaharopoulos  
Standing Chapter 13  
(Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

*Asst. U.S. Trustee*  
United States Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102